

Appl. No. 09/744,278
Reply to Office Action of July 9, 2004

Docket No. LOGO-006PUS

REMARKS

The above-identified patent application has been amended and Applicants respectfully request the Examiner to reconsider and again examine the claims as amended.

Claims 1-62 are pending in the application. Claims 1-62 are rejected. Claims 1, 10, 18, 20, 24, 33, 36, 40, 41, 49 and 53 are amended herein.

The Claim Objections

The Examiner objects to Claim 20, stating that in Line 1 "... 'Claim 18' should be corrected to read -Claim 19--... ," in order to correct antecedent basis. Applicants have Amended Claim 20 accordingly.

The Examiner also objects to Claim 36, stating "... 'stop' should be corrected to read -step--." Applicants have Amended Claim 36 accordingly.

In view of the above, Applicants submit that the claim objections should be removed.

The Rejections under 35 U.S.C. §112, Second Paragraph

The Examiner rejects Claim 24 under 35 U.S.C. §112 second paragraph.

Applicants have amended Claim 24 herein to correct the antecedent basis. Thus, Applicants submit that Claims are now proper under 35 U.S.C. §112, second paragraph.

In view of the above, Applicants submit that the rejection of Claim 24 under 35 U.S.C. §112, second paragraph, should be removed.

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The Rejections under 35 U.S.C. §103(a)

Hiroya et al. in View of Kleinman et al.

The Examiner rejects Claims 1-24, 33-38, 40-48, and 50-62 under 35 U.S.C. §103(a) as being unpatentable over Hiroya et al. (U.S. Patent number 5,751,957) in view of Kleinman et al. (U.S. Patent number 5,724,503). With regard to Claim 1, the Examiner asserts that Hiroya et. al. discloses a client for sending a translation request and a translation engine for receiving the translation request, as set forth in Claim 1. The Examiner recognizes that Hiroya et al. does not teach "...that the translation is requested, transmitted, and received using distributed object protocol..." The Examiner relies upon Kleinman et al. as teaching " ...a means of requesting and providing a translation of a text message using distributed object protocol... ."

The Examiner also asserts that Hiroya et al. and Kleinman et al. are analogous art "...because they are from a similar field of endeavor in network-based applications utilizing language translations." The Examiner concludes that "...it would have been obvious to a person of ordinary skill in the art...to combine the use of distributed object protocol in requesting and receiving a language translation as taught by Kleinman with the network-based translation system taught by Hiroya"

Applicants have amended Claim 1 herein to require "...the client also for receiving a response to the request using the distributed object protocol corresponding to a translation of the text from a first natural language to a second natural language..." Support for this amendment can be found, for example, at page 2, lines 5-14 and page 6, lines 12-13.

The present system "relates to automated natural language translation systems..." (page 1, line 3), wherein a natural language will be understood to be a written or spoken language as opposed to a computer language (see, for example, page 1, line 9).

Therefore, as an initial matter, Applicants do not agree with the Examiner's assertion that Hiroya et al. and Kleinman et al. represent analogous art. Hiroya et al. discloses a multi-language compatible service that can translate text from one natural language into another

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natural language, for example, English into Japanese. In contrast, Kleinman et al. discloses a method and apparatus for interpreting exceptions in a distributed object system. (title) The interpreting of Kleinman et al. provides an interpretation from a software exception tag (i.e., computer data) to a message text string more recognizable by a user. Kleinman et al. does not provide a translation from one natural language (e.g., English) into another natural language (e.g., Japanese). Therefore, Applicants submit the Hiroya et al. and Kleinman et al. represent non-analogous art and that one of ordinary skill in the art would, therefore, not be motivated to combine one with the other.

As the Examiner is aware, and as found in MPEP §2142, in order to establish a prima facie case of obviousness "...there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." Since Hiroya et al. and Kleinman et al. are in non-analogous fields of art, Applicants respectfully submit that the Examiner has not met this burden in order to establish prima facie obviousness.

Furthermore, Applicants submit that Kleinman et al. is concerned with distinctly different problems than the problems addressed by the present invention, and therefore, one of ordinary skill in the art faced with the problems addressed by the claimed invention would not look to the cited reference for a solution.

In view of the above, Applicants submit that Claim 1 is patentably distinct over Hiroya et al., whether taken alone or in combination with Kleinman et al.

Claims 2-24 depend from and thus include the limitations of Claim 1. Thus, Applicants submit that Claims 2-24 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 1.

Applicants have amended Claim 33 herein to require "...(a) sending a translation request from a client to a translation engine using a distributed object protocol, the translation request

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comprising text to be translated from a first natural language to a second natural language ; (b) receiving, at the translation engine, the request using the distributed object protocol ; (c) performing, at the translation engine, a translation of the text from the first natural language to the second natural language in response to the received translation request, said translation producing a response corresponding to the translation of the text from the first natural language to the second natural language ; and (d) sending the response from the translation engine to the client using the distributed object protocol."

For substantially the same reasons described in conjunction with Claim 1, Applicants submit that Claim 33 is patentably distinct over Hiroya et al., whether taken alone or in combination with Kleinman et al.

Claims 34-38 and 40 depend from and thus include the limitations of Claim 33. Thus, Applicants submit that Claims 34-38 and 40 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 33.

Applicants have amended Claim 41 herein to require "... (a) a plurality of translation engines, each translation engine for receiving a translation request using a distributed object protocol and for generating a response and forwarding the response to the translation request using the distributed object protocol, the translation request comprising text to be translated from a first natural language to a second natural language, and the response comprising a translation of the text from the first natural language to the second natural language ; and (b) a client for sending the translation request to any of the plurality of translation engines using the distributed object protocol and for receiving the response from that translation engine using the distributed object protocol."

For substantially the same reasons described in conjunction with Claim 1, Applicants submit that Claim 41 is patentably distinct over Hiroya et al., whether taken alone or in combination with Kleinman et al.

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Claims 42-48 and 50-52 depend from and thus include the limitations of Claim 41. Thus, Applicants submit that Claims 42-48 and 50-52 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 41.

Applicants have amended Claim 53 herein to require "... (a) a plurality of clients, each for sending a translation request using a distributed object protocol to at least one translation engine and each for receiving a response to the translation request using the distributed object protocol, the translation request comprising text to be translated from a first natural language to a second natural language and the response corresponding to a translation of the text from the first natural language to the second natural language ; and (b) a translation engine for receiving at least one translation request from any one of the plurality of clients using a distributed object protocol and for generating a response and forwarding the response to the request to that client using the distributed object protocol."

For substantially the same reasons described in conjunction with Claim 1, Applicants submit that Claim 53 is patentably distinct over Hiroya et al., whether taken alone or in combination with Kleinman et al.

Claims 54-62 depend from and thus include the limitations of Claim 53. Thus, Applicants submit that Claims 54-62 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 53.

In view of the above, Applicants submit that the rejection of Claims 1-24, 33-38, 40-48, and 50-62 under 35 U.S.C. §103(a) should be removed.

Hiroya et al. in View of Kleinman et al. and Murata et al.

The Examiner rejects Claims 25-28 and 39 under 35 U.S.C. §103(a) as being unpatentable over Hiroya et al. in view of Kleinman et al. and further in view of Murata et al. (U.S. Patent number 5,987,402). With regard to Claim 25, the Examiner asserts that Hiroya et al. in view of Kleinman et al. discloses the network-based translation system utilizing distributed

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object protocol, as applied to Claim 1. The Examiner also asserts that Kleiman et al. teaches the IDL, as applied to Claim 2. The Examiner recognizes that a combination of Hiroya et al. and Kleinman et al. does not suggest "...the use of an asynchronous translator..." The Examiner relies upon Murata et al. as teaching the asynchronous translator.

The Examiner also asserts that Hiroya et al., Kleinman et al., and Murata et al. are analogous art "...because they are from a similar field of endeavor in network-based applications utilizing language translations." The Examiner concludes that "...it would have been obvious to a person of ordinary skill in the art...to combine the means of providing a partial translation...as taught by Murata with the network-based translation system utilizing distributed object protocol and IDL as taught by Hiroya in view of Kleinman..."

Claims 25-28 depend from and thus include the limitations of Claim 1. Thus, Applicants submit that Claims 25-28 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 1.

Claim 39 depends from and thus include the limitations of Claim 33. Thus, Applicants submit that Claim 39 is patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 39.

In view of the above, Applicants submit that the rejection of Claims 25-28 and 39 under 35 U.S.C. §103(a) should be removed.

Hiroya et al. in View of Kleinman et al. and Kuno et al.

The Examiner rejects Claims 29-32 and 49 under 35 U.S.C. §103(a) as being unpatentable over Hiroya et al. in view of Kleinman et al. and further in view of Kuno et al. (U.S. Patent number 5,528, 491). With regard to Claims 29 and 30, the Examiner asserts that Hiroya et al. in view of Kleinman et al. discloses the network-based translation system having a translation server utilizing distributed object protocol, as applied to Claim 1. The Examiner also asserts that Kleinman et al. also teaches the IDL, as applied to Claim 2. The Examiner recognizes

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that a combination of Hiroya et al. and Kleinman et al. does not suggest "...an alternate word or sentence locator. The Examiner relies upon Kuno et al. as teaching the alternate word or sentence locator.

The Examiner also asserts that Hiroya et al., Kleinman et al., and Kuno et al. are analogous art "...because they are from a similar field of endeavor in network-based applications utilizing language translations." The Examiner concludes that "...it would have been obvious to a person of ordinary skill in the art...to combine the method of providing an alternate translation request comprising alternate words and sentences as taught by Kuno with the network-based translation system having a translation server utilizing distributed object protocol and IDL as taught by Hiroya in view of Kleinman..."

Claims 29-32 depend from and thus include the limitations of Claim 1. Thus, Applicants submit that Claims 29-32 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 1.

Claim 49 depends from and thus include the limitations of Claim 41. Thus, Applicants submit that Claim 49 is patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 41.

In view of the above, Applicants submit that the rejection of Claims 29-32 and 49 under 35 U.S.C. §103(a) should be removed.

In view of the above Amendment and Remarks, Applicants submit that Claims 1-62 and the entire case are in condition for allowance and should be sent to issue and such action is respectfully requested.

The Examiner is respectfully invited to telephone the undersigning attorney if there are any questions regarding this Amendment or this application.

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The Assistant Commissioner is hereby authorized to charge payment of any additional fees associated with this communication or credit any overpayment to Deposit Account No. 500845, including but not limited to, any charges for extensions of time under 37 C.F.R. §1.136.

Respectfully submitted,

Dated:

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DALY, CROWLEY & MOFFORD, LLP

By:

Kermit Robinson

Reg. No. 48,734

Attorney for Applicant(s)

275 Turnpike Street, Suite 101

Canton, MA 02021-2354

Tel.: (781) 401-9988, ext. 24

Fax: (781) 401-9966

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